

Fox, J

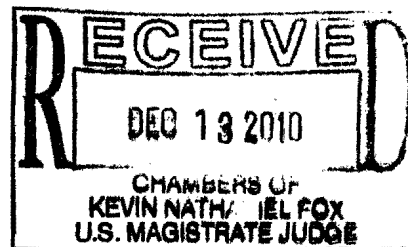
UNITED STATES DISTRICT COURT FOR THE
SOUTHERN DISTRICT OF NEW YORK

CHRISTINE RODRIGUEZ,
SANDRA BURGA, KAREN MALAK,
JAMES TORTORA, LISA BRUNO,
JANEEN CAMERON, KAREN MCBRIDE and
ANDREW WOOLF,
Individually, and for all others similarly situated,

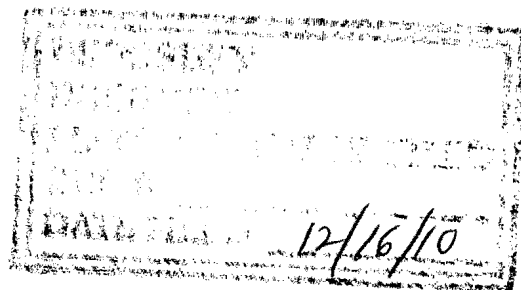
Plaintiffs,

IT'S JUST LUNCH INTERNATIONAL
IT'S JUST LUNCH, INC., HARRY and
SALLY, INC., RIVERSIDE COMPANY,
LOREN SCHLACHET, IJL NEW YORK CITY
FRANCHISE, IJL ORANGE COUNTY
FRANCHISE, IJL CHICAGO FRANCHISE,
IJL PALM BEACH FRANCHISE, IJL DENVER
FRANCHISE, IJL AUSTIN FRANCHISE, IJL
LOS ANGELES-CENTURY CITY FRANCHISE,
and DOES 1-136,

Defendants.



Case No.: 07-CV-9227 (SHS)(KNF)



**STIPULATION AND PROTECTIVE ORDER REGARDING
CONFIDENTIAL INFORMATION PRODUCED BY SUBPOENAED NON-PARTIES**

WHEREAS, on, or about October 20, 2010, plaintiffs in the above-referenced action, Christine Roridguez, et al. ("Plaintiffs"), served separate Subpoenas upon non-parties Jones Day and The Riverside Company (the "Subpoenaed Parties") requesting the production of documents;

WHEREAS, the Subpoenaed Parties each asserted objections to the Subpoena, and thereafter Plaintiffs and the Subpoenaed Parties reached agreements upon document productions which will be deemed to satisfy the Subpoenaed Parties' respective obligations to respond to the Subpoenas;

WHEREAS, the agreements require production of documents that the Subpoenaed Parties deem to be business sensitive, confidential information;

WHEREAS, on or about June 11, 2010, Plaintiffs and the defendants in the above-captioned action, It's Just Lunch International, et al. (the "Defendants"), entered into a Stipulation and Protective Order which provided, *inter alia*, confidentiality protection over documents which a producing party designated as confidential, which Protective Order Magistrate Judge Kevin N. Fox So Ordered on June 11, 2010 (the "June 11, 2010 Protective Order"); and

WHEREAS, Plaintiffs, Defendants and the Subpoenaed Parties agree that the terms of the June 11, 2010 Protective Order should apply to any document production made by the Subpoenaed Parties; **THEREFORE**,

IT IS HEREBY STIPULATED AND AGREED, by and between the attorneys for the Plaintiffs, Defendants and Subpoenaed Parties, as follows:

The June 11, 2010 Protective Order shall apply to the forthcoming document production to be made by the Subpoenaed Parties. The Subpoenaed Parties may designate documents as Confidential under the terms of the June 11, 2010 Protective Order, and the Plaintiffs and Defendants shall treat any designated documents accordingly. Plaintiffs and Defendants agree that the Subpoenaed Parties shall have standing to enforce any breach of this or the June 11, 2010 Protective Order, and/or to seek appropriate remedies in the event of a breach.

SO ORDERED ON _____, 2010

~~HONORABLE KEVIN N. FOX~~ *MF USMJ*

SO STIPULATED

LEWIS BRISBOIS BISGAARD & SMITH

BALESTRIERE FARELLO

By: 

By: 

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Attorneys for Plaintiffs

JONES DAY

By: Mark R. Sciden /s/

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*Attorneys for Subpoenaed Non-Parties
The Riverside Company and
Jones Day*

SO ORDERED: 12/16/10

Kevin Nathaniel Fox
U.S.D.J.
M
63C